brightlink

NOTICE OF EX PARTE

May 15, 2020

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Subject: **WC Docket No. 17-97:** *Call Authentication Trust Anchor*
WC Docket No. 20-67: *Implementation of TRACED Act Section 6(a) —*
Knowledge of Customers by Entities with Access to Numbering
Resources

Dear Ms. Dortch:

I am writing to raise awareness within the Commission of a serious obstacle to widespread deployment of STIR/SHAKEN and to encourage the Commission to support a remedy to overcome this obstacle.

Brightlink is a leading communications platform and technology company that delivers voice, messaging, analytics, and cloud-based solutions. Our industry-leading CPaaS platform, cloud-based voice and messaging applications, and network services are used by companies ranging from small to mid-sized businesses to the largest enterprises and communication service providers around the globe. Our next-generation IP network powers more than 35 billion communication interactions each year.

Brightlink began using STIR/SHAKEN in February 2020.[1] We now provide STIR/SHAKEN call authentication across our entire production network using the SHAKEN PKI. With this capability, our customers are more likely to have their calls answered since they will have been verified as legitimate, and we validate calls they receive to verify authenticity. We view this as a service benefit to our customers and a market differentiator for Brightlink.

Although our network is 100% IP, we are forced to exchange many calls with multiple TDM interconnects to the PSTN. In these cases, IP is not an option. We see no indication that the carriers who maintain these TDM interconnects have any intention of upgrading them any time soon. As you know, non-IP network segments prevent the transport of STIR/SHAKEN information within the call signaling.

This is a serious obstacle to ubiquitous participation in the STIR/SHAKEN ecosystem within the United States and will impede industry efforts to combat illegal robocalling.

---

[1] *See* Brightlink Takes on Robocalling with STIR/SHAKEN Solution, https://www.brightlink.com/brightlink-takes-on-robocalling-with-stir-shaken-solution/ (last visited May 9, 2020)

Brightlink
2859 Paces Ferry Road, Suite 1850
Atlanta, GA 30339

Fortunately, there is a remedy available, called out-of-band SHAKEN. It builds upon the STIR/SHAKEN framework by allowing identity tokens to be exchanged across the internet directly between originating and terminating service providers. With out-of-band token transmission, service providers can exchange calls across any call path and still provide the benefits of STIR/SHAKEN call authentication to their customers.

Brightlink's STIR/SHAKEN solution has out-of-band features enabled. We would like to see out-of-band SHAKEN used more widely across the industry so we can deliver call authentication benefits on all calls that we serve.

We appreciate the Commission's efforts to restore trust in the telephone network with energetic support for timely deployment of STIR/SHAKEN. The Commission can further assist with this effort by supporting innovative SHAKEN solutions for TDM interconnects, such as out-of-band SHAKEN.

Respectfully Submitted,

/s/ Joe White

Joe White
Chief Technology Officer

Brightlink
2859 Paces Ferry Road, Suite 1850
Atlanta, GA 30339